

RCRA INSPECTION REPORT
ENVIRONMENTAL PROTECTION AGENCY, REGION 9
TOXICS AND WASTE MANAGEMENT DIVISION
FIELD OPERATIONS BRANCH

Purpose: RCRA Investigation

Facility: Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

Facility ID Number: CAD050806850

Report Number: R(87)E238

Date of Inspection: September 23, 1987

EPA Investigators: Donn Zuroski
Geologist

William Weis III
Environmental Scientist

Facility Representative: John J. Lidyoff
President

Report Prepared By: Donn Zuroski

Report Date: November 5, 1987

III. General Facility Standards:
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Required Notices:			
1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?		N/A	
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?			
(B) General Waste Analysis:			
1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?			SEE ATTACHED CHECKLIST FROM FACILITY
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?			ATTACHMENT B
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?			
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?			
5. Is the analysis repeated when there is a change in the process (265.13a.3)?			
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?			
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?			

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Does the facility have a detailed waste analysis plan (265.13b)?	---	---	SEE ATTACHMENT B
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	---	---	
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)?	---	---	
b. Rationale for the selection of each parameter (265.13b.2)?	---	---	
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)?	---	---	
d. Frequency which each analysis will be repeated (265.13b.4)?	---	---	
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?	---	---	
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?	---	---	
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)?	---	---	
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?	---	---	
(C) Security:			
1. Do security measures include:			
a. 24-hour surveillance (265.14b.1)?	---	---	

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Are inspections recorded in an inspection log (265.15d)?	---	---	SEE ATTACHMENT B
9. Does the log include: (265.15d)			
a. Date and time of inspection?	---	---	
b. Name of inspector?	---	---	
c. Observations recorded?	---	---	
d. Date and nature of repairs or other remedial actions?	---	---	
10. Are inspection records kept for at least 3 years (265.15d)?	---	---	
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)?	---	---	
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)?	---	---	
3. Does the program include training in: (265.16a.3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	---	---	
b. Emergency procedures including contingency plan implementation?	---	---	
4. Do new personnel receive required training within 6 months (265.16b)?	---	---	
5. Do personnel take part in an annual review of the initial training (265.16c)?	---	---	

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Do personnel training records include: (265.16d)			SEE ATTACHMENT B
a. Job titles?	---	---	
b. Job Descriptions?	---	---	
c. Descriptions of training?	---	---	
b. Records of training?	---	---	
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)			
a. Separation and protection from ignition sources?	---	---	
b. No smoking signs in hazard areas?	---	---	
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction?	---	---	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	---	---	
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)	---	---	
d. Threaten human health or the environment?	---	---	

IV. Preparedness and Prevention:
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. to the environment (265.31)?	—	—	BAKER TONKS ARE NOT ✓ CONTAINED. H.W. IS DRIPPING TO THE GROUND DRUM STORAGE IS VERY BAD
(B) Required Equipment:			
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)?	—	—	SEE ATTACHMENT B
b. Telephone or 2-way radios at the scene of operation (265.32b)?	—	—	
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)?	—	—	
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?	—	—	
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?	—	—	
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)?	—	—	
(E) Required Aisle Space:			
1. Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?	—	—	✓ DRUM STORAGE HAS NO AISLE SPACE

IV. Preparedness and Prevention: - Contin.
(Part 265 Subpart C)

Yes No Comments

(F) Arrangements With Local Authorities:

1. Has the facility made the following arrangements:

a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?

SEE ATT. B

b. Agreements designating primary emergency authority (265.37a.2)?

c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?

d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?

2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?

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V. Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Does the facility have a contingency plan (265.51a)?	---	---	SEE ATTACHMENT B
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	---	---	
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	---	---	
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	---	---	
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	---	---	
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	---	---	
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)?	---	---	
2. Has the plan been submitted to all local emergency organizations (265.53b)?	---	---	

V. Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

Yes No Comments

(D) Amendment Of Contingency Plan:

1. Has the plan been reviewed and immediately amended when required (265.54)?

SEE ATTACHMENT B

(E) Emergency Coordinator:

1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?

2. Does the coordinator have authority to carry out the contingency plan (265.55)?

(F) Emergency Procedures:

1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?

VI. Manifest System, Recordkeeping, and Reporting
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Use of Manifest System:			
1. Does the facility comply with the following manifest requirements:			SEE ATT B
a. Sign and date each copy of the manifest (265.71a.1)?	---	---	
b. Note any significant * discrepancies in the manifest (265.71a.2)?	---	---	
c. Give transporter one copy of the signed manifest (265.71a.3)?	---	---	
d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?	---	---	
2. Are records of past shipments retained for 3 years (265.71a.5)?	---	---	
(B) Manifest Discrepancies:			
1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?	---	---	
2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?	---	---	
(C) Operating Record:			
1. Does the facility maintain an operating record (265.73a)?	---	---	
* Significant discrepancies are:			
1. For bulk waste; variations > 10% in weight			
2. For containerized waste; variations > one drum			
3. Obvious differences such as waste solvent substituted for waste acid			

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

Yes No Comments

2. Does the operating record contain the following information:

NOT INSPECTED

a. A description and the quantity of each waste received (265.73b.1)?

b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)?

c. The location of each waste within the facility and the quantity at each location (265.73b.2)?
(This information must include cross-references to specific manifest numbers.)

✓

DRUMS IN STORAGE ARE NOT ON THE RECORD

d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?

e. Records and results of all waste analysis and trial tests (265.73b.3)?

f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?

g. Records and results of operator inspections (265.73b.5)?

h. Monitoring data (265.73b.6)?

i. All closure and post-closure costs as applicable (265.73b.7)?

3) Availability, Retention, Disposition Of Records:

1. Are all records including plans available for inspection (265.74a)?

2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)?

VI. Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

Yes No Comments

(E) Biennial Report:

1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year (265.75)?
3. Does the report include the following information: (265.75)
 - a. EPA identification number, name and address of the facility?
 - b. Calendar year covered by report?
 - c. For off-site facilities, the EPA identification number of each generator?
 - d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?
 - e. Methods of treatment, storage, or disposal for each H.W.?
 - f. Monitoring data under § 265.94a.2.ii and iii and b.2 ?
 - g. Most recent closure and post-closure cost estimates?
 - h. Required certification?

SEE ATTACHMENT B

X. Use And Management Of Containers:
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?	<u> </u>	<u> </u>	<u>SEVERAL BULGING & LEAKING DRUMS</u>
2. Are containers compatible with H.W. stored in them (265.172)?	<u> </u>	<u> </u>	<u>NOT INSPECTED</u>
3. Are containers stored closed (265.173a)?	<u> </u>	<u> </u>	<u> </u>
4. Are containers managed to prevent rupture or leakage (265.173b)?	<u> </u>	<u> </u>	<u> </u>
5. Are containers inspected weekly for leaks and deterioration (265.174)?	<u> </u>	<u> </u>	<u>NOT INSPECTED</u>
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?	<u> </u>	<u> </u>	<u>NOT INSPECTED</u>
7. Are incompatible wastes stored in separate containers (265.177a)?	<u> </u>	<u> </u>	<u>NOT INSPECTED</u>
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?	<u> </u>	<u> </u>	<u> </u>
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device (265.177c)?	<u> </u>	<u> </u>	<u> </u>
10. Are containers that are not empty managed as a H.W. (261.7a.2)?	<u> </u>	<u> </u>	<u> </u>
11. For a container to be considered empty the facility must ensure that:	<u> </u>	<u> </u>	<u> </u>
a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?	<u> </u>	<u> </u>	<u> </u>
b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?	<u> </u>	<u> </u>	<u> </u>

XI. Tanks:
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Damage the structural integrity of the tank?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

NOT INSPECTED

Site: OIL PROCESS CO.

Photographer: COMMANDER Wm. WEIS III date: 9-23-87

photo # 1

description:

GENERAL VIEW OF TREATMENT
SYSTEM



photo # 2

description:

BAKER TONKS USED TO
HOLD WASTE BEFORE IT
IS SENT THROUGH A
TREATMENT SYSTEM



Site: OIL PROCESS CO.

Photographer: COMMANDER Wm. WEIS III date: 9-23-81

photo # 5

description:

AIR STRIPPING TOWER



photo # 6

description:

GENERAL VIEW



Site: OIL PROCESS CO.

Photographer: COMMANDER WM. WEIS III date: 9-23-87

photo # 7

description:

FILTER PRESS



photo # 8

description:

FILTER PRESS



Site: OIL PROCESS CO.

Photographer: COMMANDER Wm. WEIS III date: 9-23-87

photo # 9

description:

LEAKING DRUM



photo # 10

description:

VIEW OF BERM AROUND
TANK TREATMENT SYSTEM



Site: OIL PROCESS CO.

Photographer: COMMANDER WM. WEIS III date: 9-23-87

photo # 11

description:

OPEN DRUM IN STORAGE



photo # 12

description:

OPEN CONTAINERS



Site: OIL PROCESS CO.

Photographer: COMMANDER WM. WEIS III date: 9-23-87

photo # 13

description:

DRUM STORAGE

NOTE LACK OF AISLE SPACE

OPEN DRUM —————

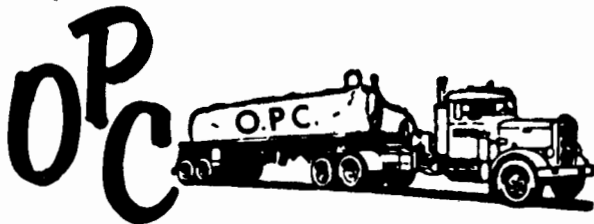


photo # 14

description:

SAME AS ABOVE





OIL INC., dba

OIL PROCESS CO.

5756 Alba Street • Los Angeles • California 90058

(213) 585-5063

October 9, 1987

U.S. Environmental Protection Agency
215 Freemont Street
San Francisco, CA 94105

ATTENTION: Don Zuroski

Dear Mr. Zuroski:

The Oil Process Company, treatment and disposal site was inspected by representatives, yourself & Mr. W.J. Weiss III, of the Environmental Protection Agency, on September 22, 1987; your inspection resulted in a request for corrective action in two areas.

The first request was that, the baker tank receiving area be diked to provide spill containment. The second corrective action requested, the Oil Process Company, handling procedure for drummed materials be upgraded.

The current receiving area at the Oil Process Company, facility consists of four temporary baker tanks; these tanks were not enclosed by a spill containment structure.

A dike system was not previously installed due to the temporary nature of these vessels. As requested, Oil Process Company, has installed a containment structure around these vessels.

The containment structure consists of a concrete and steel dike; the dike provides a containment volume of over thirty thousand gallons. The largest tank within the dike holds twenty thousand gallons, photographs of the new dike are attached to this report.

The second area which you had requested be upgraded, covered the handling of drummed materials at Oil Process Company. To comply with this request, we have completed three corrective actions; these actions included the processing of all drums on site on September 30, 1987, and revising company procedures for the handling and analysis of drummed solids.

The drummed materials on site were commingled under the supervision of our technical staff. The commingled material was then stabilized with lime kiln dust and shipped to Casmalia Resources; a copy of the manifest and the analysis are attached.

The empty drums remaining after stabilizing were crushed and are scheduled for disposal Monday October 12, 1987. I will forward to your attention, the completed manifest after the containers have been disposed of at Casmalia Resources.


Our handling procedures for receiving and processing drummed waste have been revised. Shipments of drummed waste are now required to have detailed analysis.

Processing and storage instructions are issued in writing before materials are unloaded. A copy of these procedures is attached.

An Oil Process analysis procedure has been established for drummed materials. Shipments will not be accepted by Oil Process Company, without adequate analysis; a copy of the analysis procedure is attached.

We appreciate your assistance in reviewing our operations, if you have any further questions, please call.

Sincerely Yours,



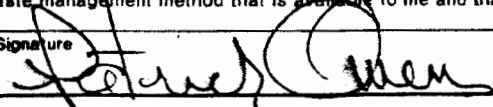
John J Lidyoff
President

JJL/imb

Enclosure: Copies

SOLIDS/DRUMMED MATERIAL
SHIPPING AND RECEIVING

1. No material is to be accepted for transportation or received at Oil Process Company, without an analysis report.
2. Material not packaged to DOT specifications, will not be accepted or shipped by Oil Process Company.
3. Materials must be accompanied by a proper Hazardous Waste Manifest. Please note, all generator provided information must be on the manifest in the proper locations.
4. Material received at Oil Process Company, will not be unloaded without explicit written instructions from the dispatcher or his representative.
5. Written unloading instructions will include, explicit treatment instructions with a deadline completion of the proposed treatment. (10 days normally) for completion of the proposed treatment.
6. Unloading instructions will include, specific holding areas with proper consideration for compatible storage and containment requirements.
7. All samples required for treatment will be taken when the material is unloaded. Written requests for required action by the lab or engineering will be made at that time.
8. Drums will not be accepted which are leaking or are improperly closed.
9. Ten percent of all drums accepted are to be opened before the material is accepted; written records of the inspection are to be made.
10. Material manifested to a landfill are not to be accepted; which inspection shows free liquids or which the drums are not ninety percent or more full.
11. If material is not acceptable to Oil Process Company, call the dispatcher or his representative.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No C A D 0 5 0 8 0 6 8 5 0		Manifest Document No 2 2 1 7		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address OIL PROCESS COMPANY 5756 ALBA STREET; LOS ANGELES, CA 90058						A. State Manifest Document Number 87072484							
4. Generator's Phone 213, 585-5063						B. State of California							
5. Transporter 1 Company Name OIL PROCESS COMPANY			6. US EPA ID Number C A D 0 5 0 8 0 6 8 5 0			C. Transporter's Name OIL PROCESS COMPANY			D. Transporter's Phone 213-585-5063				
7. Transporter 2 Company Name			8. US EPA ID Number			E. Facility's Name C A D 0 2 0 0 7 4 8 1 2 5			F. Facility's Phone 805-937-8449				
9. Designated Facility Name and Site Address CASMALIA RESOURCES NTU ROAD CASMALIA, CA						10. US EPA ID Number							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. HAZARDOUS WASTE SOLID N.O.S. ORM-E NA 9189						200 DM		0 4 4 0 0		Pds		State 513 EPA/Other Cal only	
b.												State EPA/Other	
c.												State EPA/Other	
d.												State EPA/Other	
J. Additional Descriptions for Materials Listed Above CONTAINERS EMPTY ONCE CONTAINING FLAMMABLE LIQUIDS						K. Handling Codes for Wastes Listed Above a. b. c. d.							
15. Special Handling Instructions and Additional Information GLOVES													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name PATRICK OWENS						Signature 				Month Day Year 11 0 1 87			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name						Signature				Month Day Year			

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

C A D 0 5 0 8 0 6 8 5 0

Manifest Document No.

22 1 8

2. Page of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

OIL PROCESS COMPANY

5756 ALBA STREET, LOS ANGELES, CA 90058

4. Generator's Phone (213) 585-5063

5. Transporter 1 Company Name
OIL PROCESS COMPANY

9. US EPA ID Number
CAD 050 806 850

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CASMALIA RESOURCES

NTU ROAD

CASMALIA, CA

10. US EPA ID Number

C A D 0 2 0 0 7 4 8 1 2 5

A. State Manifest Document Number

87072485

B. State Generator's ID

CAD 050 806 850

C. State Transporter's ID

CAD 050 806 850

D. State Facility's ID

CAD 020 074 8125

E. Facility's Phone

805/937-8449

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit
Wt/Vol

1. Waste No.

a. WASTE CORROSIVE SOLIDS UN 1759

5 0 D M 0 1 1 0 0 PD

State 513

EPA/Other CA Only

b.

State

EPA/Other

c.

State

EPA/Other

d.

State

EPA/Other

J. Additional Descriptions for Materials Listed Above

CONTAINERS EMPTY

ONCE CONTAINING CORROSIVE SOLIDS

K. Handling Codes for Wastes Listed Above

a.

b.

c.

d.

15. Special Handling Instructions and Additional Information

GLOVES

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

PATRICK OWENS

Signature

Patrick Owens

Month Day Year

11 01 13 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

11 01 13 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

11 01 13 87

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

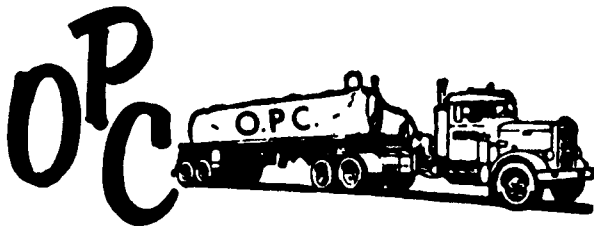
Month Day Year

11 01 13 87

GENERATOR

TRANSPORTER

FACILITY



OIL INC., dba

OIL PROCESS CO.

5756 Alba Street • Los Angeles • California 90058

(213) 585-5063

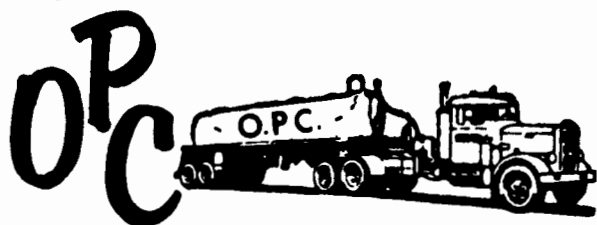
To address EPA concerns regarding the monitoring of our solid (drummed) waste, the Oil Process Company Laboratory is implementing the following program:

1. A small portion of the waste will be exposed to a flame to determine its ignitability.
2. Equal weights of the waste and water will be mixed to determine the reactivity of the waste. This mixture will be shaken for one hour, then Cyanide and Sulfide determinations will be made on the resultant liquid. The pH of this same liquid will be taken to determine the corrosivity of the waste.
3. A sample of the waste will be acid digested and total values of these metals will be obtained: Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Silver, and Zinc.
4. A headspace technique will be used to prepare the waste for a determination of the halogenated (see attached list) and non-halogenated (Acetone, Benzene, Carbon Disulfide, Isopropyl Alcohol, MEK, MIBK, Toluene, and Xylenes) compounds present.

We look forward to your approval of this program and are open to any suggestions for improvement that you may wish to make.

Sincerely,

John J. Lidyoff
President



OIL INC., dba

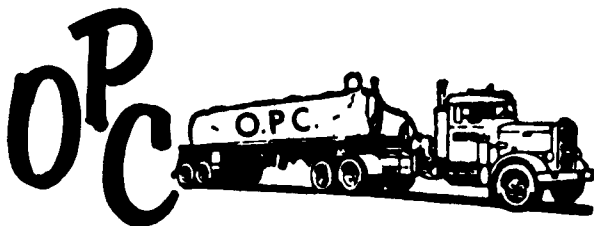
OIL PROCESS CO.

5756 Alba Street • Los Angeles • California 90058

(213) 585-5063

CHLORINATED SOLVENTS LIST

<u>Constituent</u>	<u>Concentration (mg/kg)</u>
Trichlorofluoromethane	_____
1,1-Dichloroethylene (Vinylidene Chloride)	_____
trans-1,2-Dichloroethylene	_____
1,1-Dichloroethane	_____
1,1,1-Trichloroethane	_____
Carbon Tetrachloride	_____
Methylene Chloride	_____
Trichloroethylene	_____
Chloroform	_____
Tetrachloroethylene	_____
1,2-Dichloropropane	_____
1,2-Dichloroethane	_____
2-Chloroethyl Vinyl Ether	_____
cis-1,3-Dichloropropene	_____
Bromodichloromethane	_____
trans-1,3-Dichloropropene	_____
1,1,2-Trichloroethane	_____
Chlorodibromomethane	_____
1,3-Dichlorobenzene	_____
1,4-Dichlorobenzene	_____
Bromoform	_____
1,2-Dichlorobenzene	_____
Unknowns	_____
nd = none detected	



OIL INC., dba

OIL PROCESS CO.

5756 Alba Street • Los Angeles • California 90058

(213) 585-5063

ACCEPTANCE LIST

OIL PROCESS CO-DRUMMED SOLIDS 9/28/87

<u>Constituent</u>	<u>Concentration (mg/kg)</u>
Arsenic	<10.0
Cadmium	<1.0
Chromium (total)	282.0
Copper	8820.0
Lead	62.0
Mercury	<10.0
Nickel	158.0
Silver	4.0
Zinc	536.0
Acetone	17.0
Methylene Chloride	<10.0
Isopropyl Alcohol	24.0
MEK	<10.0
1,2-Dichloroethane	<10.0
1,1,1-Trichloroethane	39.0
Benzene	<10.0
MIBK	<10.0
Perchloroethylene	<10.0
Toluene	<10.0
Other Organic Constituents	157.0

Respectfully Submitted,

Shawn A. Coleman
Laboratory Manager/
Analytical Chemist

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
CAD 0508068503333

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
OIL PROCESS COMPANY
5756 ADA STREET, LOS ANGELES, CA 90028

4. Generator's Phone
213 365-5000

5. Transporter 1 Company Name
OIL PROCESS COMPANY

6. US EPA ID Number
CAD 006 006 050

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
CASMALIA RESOURCES
MTU ROAD
CASMALIA, CA 93429

10. US EPA ID Number
CAD 0748125

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit
Wt/Vol

15. Waste No.

a. Hazardous waste solid N.O.S. ORM-E NA 9189 1 CM 8 Y 171
EPA/Other
0006

b.

c.

d.

J. Additional Descriptions for Materials Listed Above
FLUOR CARBIDE MITE BINC 500 - 8000 PPM
CHROMIUM 200 - 3000 PPM
LEAD 300 - 2000 PPM

K. Handling Codes for Wastes Listed Above
a. 03 b. c. d.

15. Special Handling Instructions and Additional Information
GLOVES AND GOGGLES Box 415

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Printed/Typed Name
PATRICK OWENS

Signature
Patrick Owens

Month Day Year
11/10/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name
Steve Erickson

Signature
Steve Erickson

Month Day Year
11/10/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name
#46062 - 38,740 Lbs Casmalia Resources Marc Crosby

Signature
Marc Crosby

Month Day Year
11/10/87

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY THAT THE FOLLOWING DESCRIBED COMMODITY WAS WEIGHED, MEASURED, OR COUNTED BY A WEIGHMASTER, WHOSE SIGNATURE IS ON THIS CERTIFICATE, WHO IS A RECOGNIZED AUTHORITY OF ACCURACY, AS PRESCRIBED BY CHAPTER 7 (COMMENCING WITH SECTION 12700) OF DIVISION 5 OF THE CALIFORNIA BUSINESS AND PROFESSIONS CODE, ADMINISTERED BY THE DIVISION OF MEASUREMENT STANDARDS OF THE CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE.

WEIGHTED AT: **N.T.U. ROAD, CASMALIA, CA.**

WEIGHT IN POUNDS:

PH. 78500 lb GROSS
39760 lb TARE
38740 lb NET

10-1-87 3:24PM

BY: CASMALIA RESOURCES

WEIGHMASTER

DEPUTY

DRIVER

CLASS

SPR

☒ HAZARDOUS

☐ NON-HAZARDOUS

CASMALIA RESOURCES

P.O. BOX 5275 • SANTA BARBARA, CA 93150 • PHONE (805) 969-8897

96662

GENERATOR

Oil Process

TRANSPORTER

Oil Process

POINT OF ORIGIN

Los Angeles

WASHOUT: YES

NO

MANIFEST #

87072441

87072440

** Bill 1 hr. loader Time*

TRUCK

LIC. #

TRAILER

LIC. #S

2P94255
YS2917

FOR OFFICE USE ONLY

1. _____ @ _____
2. _____ @ _____
3. _____
4. WASHOUT _____
5. Hazardous Waste Fee _____ TONS @ _____
6. SUPERFUND _____
7. S. B. COUNTY TAX _____
- TOTAL \$ _____

PHOTOS PROVIDED BY
OIL PROCESS CO. TO DOCUMENT
CORRECTIVE ACTION





















6 NOV 1987

In Reply to T-3-2
Refer to: R(67)E238

John J. Lidyoff
President,
Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

Dear Mr. Lidyoff:

On September 23, 1987, a hazardous waste investigation was conducted at the Oil Process Company. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act of 1976. A copy of our report is enclosed for your information.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have questions related directly to technical aspects of this report, please contact Donn Zuroski at (415) 974-8591. Questions related to compliance with your Interim Status Document (ISD) should be directed to the Los Angeles office of the State Department of Health Services at (213) 620-2380.

Sincerely,

Pierre Belanger
Chief, Field Inspections Section

Enclosure

cc: Paul Blais, DOHS-HQ (w/encl.)
Richard Ross, DOHS-HQ (w/o encl.)
Angelo Bellomo, DOHS-Los Angeles (w/encl.)
bc: Karen Schwinn (T-2)
Michele Dermer (T-4-2)
Donn Zuroski (T-3-2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

POD did not recognize number.

RCRA Inspection Report Attached

5 NOV 1987

In Reply to T-3-2
Refer to: R(87)E238

John J. Lidyoff
President,
Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

Dear Mr. Lidyoff:

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Sincerely,

ORIGINAL SIGNED BY
KEN YELSEY

FOR
Pierre Belanger 11/6/87
Chief, Field Inspections Section

Enclosure

cc: Paul Blais, DOHS-HQ (w/encl.)
Richard Ross, DOHS-HQ (w/o encl.)
Angelo Bellomo, DOHS-Los Angeles (w/encl.)
bc: Karen Schwinn (T-2)
Michele Derner (T-4-2)

Donn Zuroski (T-3-2)

CONCURRENCES

SYMBOL	T-3-1						
SURNAME	DZ						
DATE	11-6-87						

2-Way Memo

Subject: RCRA Inspection at Oil Process Company

To : Karen Schwinn, Chief Enforcement Section (T-2-4)

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (Originator of message):

Use brief, informal language.

Conserve space.

Forward original and one copy.

RECEIVER (Replier to message):

Reply below the message, keep one copy, return one copy.

DATE OF MESSAGE

11-6-87

ROUTING SYMBOL

T-3-1

SIGNATURE OF ORIGINATOR



TITLE OF ORIGINATOR

Geologist

FOLD

MESSAGE

FOLD

Enclosed is the report for the 9-23-87 inspection at Oil Process Company.

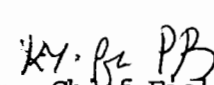
REPLY

DATE OF REPLY

ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

From : Donn Zuroski
through 
Pierre Belanger, Chief Field Inspections Section (T-3-2)

2-Way Memo

Subject: RCRA Inspection at Oil Process Company

To : Karen Schwinn, Chief Enforcement Section (T-2-4)

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11-6-87

ROUTING SYMBOL

T-3-1

SIGNATURE OF ORIGINATOR

TITLE OF ORIGINATOR

Geologist

FOLD

MESSAGE

FOLD

Enclosed is the report for the 4-23-87 inspection at Oil Process Company.

REPLY

Donn Zuroski
 From : through
 Pierre Belanger, Chief Field Inspections Section (T-3-2)

DATE OF REPLY

ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

GUIDES TO SIMPLIFIED INFORMAL CORRESPONDENCE

The cost to create a typical Government letter rises every year, as well as the cost to file and to dispose of it. Informal communication, resulting from the use of Optional Form 27, 2-WAY MEMO, can reduce these costs substantially.

Experienced letterwriters have observed the following about Government correspondence practices:

The bulk of correspondence is conducted within the governmental family—between offices whose day-to-day relationships could permit simple, informal written communication.

Many written communications are for immediate action, are routine in nature (such as requests for information or services), and do not require copies for distribution.

Many written communications are less than a dozen lines in length.

PRINCIPLES INVOLVED

1. When agencies issue instructions encouraging the use of memoranda and informal correspondence within the agency, there is a noticeable drop in the communications effort and in the time required to respond to a request, as well as a reduction of useless copies in file. Examining the two types of correspondence shows that formal correspondence has certain drawbacks:

a. Formal correspondence is usually more wordy because of salutations, introductory paragraphs, complimentary closings, etc. It becomes a difficult writing chore because of continual polishing and editing.

b. Formal correspondence typically calls for more reviews, resulting in many rewrites and retypes, and for excessive time-in-shop.

c. Formal correspondence goes through stricter clearance channels, and frequently makes communication between "opposite numbers" very difficult.

2. In many cases, the best reply is an informal endorsement on an incoming letter. Optional Form 27, 2-WAY MEMO, takes advantage of this principle.

PRACTICAL PURPOSES SERVED BY 2-WAY MEMO

1. The message and the reply are placed on the same page in brief, informal language. This simplifies writing, handling, storing, and disposing of short communications.

2. The message may be prepared by typewriter or by hand; the reply may be by typewriter, by hand, or by rubber stamp.

3. It is possible to achieve a greater delegation of signing authority with the 2-WAY MEMO because of its informal nature.

4. The 2-WAY MEMO may be designated for special handling. It may be marked URGENT if exceptional speed is required. It may be stamped for special mailing services. It may be used for classified material if it is marked with the proper security classification.

5. The "TO" line and the "FROM" line are so placed that the 2-WAY MEMO may be sent in a window envelope and returned in a window envelope, if desired.

6. The 2-WAY MEMO is particularly well suited for communication between "opposite numbers" within one agency or in different agencies.

The above guides have been prepared by the Office of Records and Information Management, National Archives and Records Service, General Services Administration.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In Reply to T-3-2
Refer to: R(87)E238

John J. Lidyoff
President,
Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

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Sincerely,

ORIGINAL SIGNED BY
KEN YELSEY

For
Pierre Belanger 11/6/87
Chief, Field Inspections Section

Enclosure

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Donn Zuroski (T-3-2)

		CONCURRENCES					
SYMBOL	T-3-1						
SURNAME	DZ						
DATE	11-6-87						